

IN THE SUPREME COURT OF FLORIDA
JULY TERM, 1989
CASE NO. 74,094

NINTH STATEWIDE GRAND JURY

CASE NO. 11

PINELLAS COUNTY

CASE NO. 90-13295-CEAND

STATE OF FLORIDA,

vs.

RALPH M. SAVAGE (A)
EUGENE B. WHITE (B)
THOMAS L. ROOT (C)
CARL W. HURLEBAUS, JR. (D)

FILED
CRIMINAL COURT RECORD
91 MAY 31 PM 1:42
KARLEEN F. DESLAKE
CLERK OF CIRCUIT COURT

SUPERSEDING INDICTMENT FOR:

COUNT 1: Racketeering
F.S. 895.03(3)
(A, B, C, D)

COUNT 2: Conspiracy to
Commit Racketeering
F.S. 895.03(4)
(A, B, C, D)

COUNT 3: Racketeering
F.S. 895.03(1)
(A, B)

COUNT 4: Organized Fraud
F.S. 817.036 (1985)
(A, B, C, D)

COUNT 5: Organized Fraud
F.S. 817.034(4) (a)
(A, B, C, D) (1986 Supp.)

COUNT 6: Organized Securities
Fraud
F.S. 517.302(2)
(A, B, C, D)

COUNTS 7-26: Securities Fraud
F.S. 517.301 and 517.302
(A, B, C) (D, 7-21)

COUNTS 27-46: Sale of
Unregistered Securities
F.S. 517.07 and 517.302
(A, B, C) (D, 27-41)

COUNT 47: Organized Fraud
F.S. 817.034(4) (a) (1986 Supp.)
(A, B)

COUNT 48: Grand Theft-First
Degree
F.S. 812.014(1) and (2) (a)
(C)

COUNT 49: Organized Fraud
F.S. 817.034(4) (a) (1986 Supp.)
(A, C)

COUNT 50: Fraudulent Issuance
of Corporate Obligation
F.S. 817.20
(A)

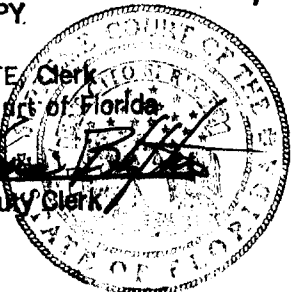
A TRUE COPY.

Attest:

SID J. WHITE, Clerk
Supreme Court of Florida

by:

Deputy Clerk



D. White - 5/20/91 change plea
guilty to Counts 1 - 41 + Count 47

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

COUNT 1

THE GRAND JURORS of the NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about January 1, 1986 and continuing through September 30, 1989 in the First, Second, Fourth, Fifth, Sixth, Twelfth, Fourteenth, Sixteenth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Santa Rosa, Leon, Gadsden, Duval, Marion, Pinellas, Manatee, Sarasota, Bay, Monroe, Broward, Indian River, St. Lucie, Hendry and Charlotte Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.** did become employed by, or associated with an enterprise as defined in Florida Statute 895.02(3), to wit: Sonrise Management Services, Inc., a Georgia corporation, a legal entity, and did unlawfully conduct or participate, directly or indirectly in such enterprise through a pattern of racketeering activity as defined by Florida Statute 895.02(4), by committing crimes chargeable by Indictment or Information under Florida Statutes Chapters 517 (relating to sale of securities and investor protection), 812 (relating to theft), and 817 (relating to fraudulent practices), including, but not limited to, the following acts:

PREDICATE ACT 1

Beginning on or about January 1, 1986 and continuing through September 30, 1987, in the Second, Fourth, Fifth, Sixth, Twelfth, Fourteenth, Sixteenth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Leon, Gadsden, Duval, Marion, Pinellas, Manatee, Sarasota, Bay, Monroe, Broward, Indian River, and Charlotte Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, through a scheme or operation by fraud or misrepresentation, did unlawfully obtain property of an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States currency from five or more persons, including, but not limited to: Michele M. Smith, Carl Shavers, Shirley Sanborn, Myles and Rose Young, Harold McDuffie d/b/a PhD Construction, and Guy and Willie Poteat, from the sale of investment contracts for an interest in an FM radio construction permit application, contrary to Florida Statute 817.036 (1985).

PREDICATE ACT 2

Beginning on or about October 1, 1987 and continuing through September 30, 1989 in the First, Second, Sixth, Twelfth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Santa Rosa, Leon, Pinellas, Sarasota, Manatee, St. Lucie, Indian River and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully engage in a scheme to defraud as defined in Florida Statute 817.034(3)(d), and did obtain property with an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States Currency, from the sale of investment contracts for an interest in an FM radio construction permit application, contrary to Florida Statute 817.034(4)(a).

PREDICATE ACT 3

Beginning on or about October 1, 1986 and continuing through September 1, 1988 in the Second, Sixth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Leon, Pinellas, Broward, Indian River, St. Lucie, and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully offer or sell in the State of Florida a security or investment, to wit: an investment contract for an interest in an FM radio station construction permit application, in violation of Florida Statute 517.301 (relating to fraudulent transactions) or 517.311 (relating to false representations) and thereby obtained money or property of an aggregate value exceeding \$50,000, to wit: \$50,000 or more in United States currency, from five (5) or more persons, to wit: Michele M. Smith, Shirley Sanborn, Carl Shavers, Myles and Rose Young, Guy and Willie Poteat, Marie Pewterbaugh, Nancy Moon, Bobby Hiers, and Harold McDuffie d/b/a PhD Construction, among others, in violation of Florida Statute 517.302(2).

PREDICATE ACT 4

On or about September 2, 1986, in the Second Judicial Circuit of Florida, that is: Leon County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$7,500 in United States currency from George Auzenne by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon George Auzenne, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 5

Beginning on or about September 8, 1986 and continuing through November 3, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$5,800 in United States currency from Maria Ferris by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Maria Ferris, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 6

On or about September 15, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,500 in United States currency from Robert Dion by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Robert Dion, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 7

On or about September 15, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,500 in United States currency from Edward Richards by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Edward Richards, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 8

On or about October 14, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,475 in United States currency from James Newsome by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon James Newsome, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 9

On or about November 11, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,475 in United States currency from Roy Cameron by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Roy Cameron, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 10

Beginning on or about February 17, 1987 and continuing through March 25, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$23,800 in United States currency from Guy and Willie Poteat by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Guy and Willie Poteat, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 11

Beginning on or about March 21, 1987 and continuing through September 3, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$12,210 in United States currency from Harold McDuffie d/b/a PhD Construction by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Harold McDuffie d/b/a PhD Construction, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 12

On or about March 27, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$5,940 in United States currency from Kenneth Damerow by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Kenneth Damerow, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 13

On or about April 17, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$5,940 in United States currency from Harry Dawkins by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Harry Dawkins, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 14

On or about April 28, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,970 in United States currency from John Hood by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon John Hood, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 15

Beginning on or about May 1, 1987 and continuing through July 31, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$7,750 in United States currency from Dana Howard by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Dana Howard, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 16

On or about May 9, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,970 in United States currency from David Lake by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon David Lake, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 17

On or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$17,820 in United States currency from Myles and Rose Young by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Myles and Rose Young, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 18

Beginning on or about June 6, 1987 and continuing through November 3, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$13,200 in United States currency from Carl Shavers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Carl Shavers, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 19

On or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Angela Thigpen by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Angela Thigpen, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 20

On or about June 9, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,970 in United States currency from Mr. and Mrs. Orville Ellis by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Mr. and Mrs. Orville Ellis, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 21

On or about June 19, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Barry Shavers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Barry Shavers, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 22

On or about June 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from George S. Johnson by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon George S. Johnson, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 23

On or about June 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Madeline Sarna by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Madeline Sarna, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 24

Beginning on or about June 25, 1987 and continuing through August 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$6,600 in United States currency from Shirley Sanborn by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Shirley Sanborn, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 25

On or about June 26, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Sidney Stinson by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Sidney Stinson, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 26

On or about July 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Glenn Shavers d/b/a Glenn's Coins by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Glenn Shavers d/b/a Glenn's Coins, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 27

On or about July 20, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Glenn Shavers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Glenn Shavers, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 28

Beginning on or about July 22, 1987 and continuing through November 3, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$6,600 in United States currency from Wayne Yates by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Wayne Yates, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 29

On or about August 3, 1987 in the Second Judicial Circuit of Florida, that is: Leon County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$9,900 in United States currency from Michele M. Smith by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Michele M. Smith, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 30

Beginning on or about August 4, 1987 and continuing through November 2, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$6,600 in United States currency from Elmer Barker by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Elmer Barker, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 31

On or about September 28, 1987 in the Sixth, Seventeenth and Nineteenth Judicial Circuits of Florida, that is: Pinellas, Broward and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Gary Duffield by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Gary Duffield, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 32

On or about October 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Emilio Castillo by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Emilio Castillo, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 33

On or about October 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Dale Gunter by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Dale Gunter, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 34

On or about October 27, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Charlotte Benscoter by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Charlotte Benscoter, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 35

On or about November 4, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Dennis Thompson by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Dennis Thompson, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 36

Beginning on or about November 25, 1987 and continuing through December 23, 1987 in the Sixth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Pinellas, Indian River and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$14,850 in United States currency from Marie Pewterbaugh by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Marie Pewterbaugh, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 37

On or about December 7, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$13,200 in United States currency from Nancy Moon by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Nancy Moon, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 38

On or about December 15, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$6,600 in United States currency from Robert Kidd by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Robert Kidd, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 39

Beginning on or about December 24, 1987 and continuing through January 6, 1988 in the Nineteenth Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$13,200 in United States currency from Bobby Hiers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Bobby Hiers, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 40

On or about January 7, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Glenn's Coins by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Glenn's Coins, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 41

On or about January 8, 1988 in the Nineteenth Judicial Circuit of Florida, that is: St. Lucie County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Gary Rust by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Gary Rust, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 42

On or about January 14, 1988 in the Second Judicial Circuit of Florida, that is: Leon County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Kenneth Hosford by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Kenneth Hosford, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 43

On or about March 3, 1988 in the Nineteenth Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Martha Damerow by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Martha Damerow, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 44

On or about March 4, 1988 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Harold McDuffie d/b/a PhD Construction by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Harold McDuffie d/b/a PhD Construction, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 45

On or about March 10, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$9,900 in United States currency from Rose Young by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Rose Young, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 46

On or about June 17, 1988 in the Sixth Judicial Circuit of Florida, that is: Pinellas County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$9,900 in United States currency from Don Kirshner by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Don Kirshner, contrary to Florida Statutes 517.301 and 517.302.

PREDICATE ACT 47

On or about September 2, 1986 in the Second Judicial Circuit of Florida, that is: Leon County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to George Auzenne which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 48

Beginning on or about September 8, 1986 and continuing through November 3, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Maria Ferris which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 49

On or about September 15, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Robert Dion which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 50

On or about September 15, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Edward Richards which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 51

On or about October 14, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to James Newsome which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 52

On or about November 11, 1986 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Roy Cameron which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 53

Beginning on or about February 17, 1987 and continuing through March 25, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Guy and Willie Poteat which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 54

Beginning on or about March 21, 1987 and continuing through September 3, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Harold McDuffie d/b/a PhD Construction which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 55

On or about March 27, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Kenneth Damerow which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 56

On or about April 17, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Harry Dawkins which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 57

On or about April 28, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to John Hood which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 58

Beginning on or about May 1, 1987 and continuing through July 31, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Dana Howard which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 59

On or about May 9, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to David Lake which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 60

On or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Myles and Rose Young which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 61

Beginning on or about June 6, 1987 and continuing through November 3, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Carl Shavers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 62

On or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Angela Thigpen which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 63

On or about June 9, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Mr. and Mrs. Orville Ellis which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 64

On or about June 19, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Barry Shavers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 65

On or about June 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to George S. Johnson which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 66

On or about June 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Madeline Sarna which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 67

Beginning on or about June 25, 1987 and continuing through August 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Shirley Sanborn which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 68

On or about June 26, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Sidney Stinson which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 69

On or about July 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Glenn Shavers d/b/a Glenn's Coins which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 70

On or about July 20, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Glenn Shavers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 71

Beginning on or about July 22, 1987 and continuing through November 3, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Wayne Yates which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 72

On or about August 3, 1987 in the Second Judicial Circuit of Florida, that is: Leon County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Michele M. Smith which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 73

Beginning on or about August 4, 1987 and continuing through November 2, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Elmer Barker which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 74

On or about September 28, 1987 in the Sixth, Seventeenth and Nineteenth Judicial Circuits of Florida, that is: Pinellas, Broward and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Gary Duffield which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 75

On or about October 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Emilio Castillo which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 76

On or about October 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Dale Gunter which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 77

On or about October 27, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Charlotte Benscoter which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 78

On or about November 4, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Dennis Thompson which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 79

Beginning on or about November 25, 1987 and continuing through December 3, 1987 in the Sixth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Pinellas, Indian River and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Marie Pewterbaugh which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 80

On or about December 7, 1987 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Nancy Moon which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.